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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO TWENTY-SIXTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (SECURITIES ADR NO
LIABILITY CLAIMS)**

[Related to Docket No. 14001]

Date: October 17, 2023

Time: 10:00 a.m. (Pacific Time)

Place: Zoom Videoconference

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

REPORT ON RESPONSES

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby submit the following report on responses to the *Reorganized Debtors’ Twenty-Sixth Securities Claims Omnibus Objection (Securities ADR No Liability Claims)* [Docket No. 14001] (the “**Objection**”).

No claimant subject to the Objection filed a response to the Objection, formally or informally. Because PERA filed the *Securities Lead Plaintiff’s Statement With Respect To Reorganized Debtors’ Twenty-Sixth Securities Claims Omnibus Objection (Securities ADR No Liability Claims)*, dated October 3, 2023 [Dkt. No. 14043] (the “**PERA Response**”), which purported to respond to the Objection on behalf of all claims objected to therein, the Reorganized Debtors did not file a request for default in advance of the hearing. Instead, the Reorganized Debtors filed a reply. *See Reply In Support Of Twenty-Sixth Securities Claims Omnibus Objection (Securities ADR No Liability Claims)* [Dkt. No. 14056].

By docket text order on October 15, 2023, the Court stated that it will “sustain [the Twenty-Sixth Securities Claims] Omnibus Objection and disallow the subject claims without discussion on October 17, 2023.” The Court further stated that “[t]he PERA [Response] is OVERRULED, as the Reply by Debtors (Dkt 14056) and the Response by the RKS Claimants (Dkt 14053) are well-taken and correct, both on procedural and substantive grounds.” *Id.*¹

While no claimant has filed a response, either formally or informally, to the Objection, certain claimants have taken the opportunity after the filing of the Objection to thereafter respond to the offers made pursuant to the Securities ADR Procedures.² As the Reorganized Debtors stated in the Objection that they would withdraw the Objection as to any claimant who thereafter responds to their offers, the Reorganized Debtors make this submission to inform the Court and parties of interest as to their intention to withdraw,

¹ The October 15, 2023 docket text order further notes: “No opposition to the Omnibus Objection to Securities Claims (Twenty-Sixth) (Securities ADR No Liability Claims) (Dkt 14001) has been filed by any respondent with standing. . . . The principal reasons are that the court has sustained several earlier similar objections, also without opposition, and the lack of any opposition by an affected claimant. The gratuitous positions advanced by PERA are out of line. The court rejects them again.”

² Capitalized terms used but not otherwise herein defined shall have the meanings given to them in the Objection.

without prejudice, the Objection as to the following claims (the “**Responding Claims**”) whose holders have responded to offers made by the Reorganized Debtors after the filing of the Objection:

Claimant	Claim Nos.	Resolution
Johnson, Christopher D.	105389	Claimant has now responded to the Reorganized Debtors’ offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Seymour, Herbert and Earlene	103666	Claimant has now responded to the Reorganized Debtors’ offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Martha H Kline Revocable Trust	103854	Claimant has now responded to the Reorganized Debtors’ offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Bucks County Employees Retirement System	101074	Claimant has now responded to the Reorganized Debtors’ offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Baldwin, Robert M.	102437	Claimant has now responded to the Reorganized Debtors’ offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Wayne Scheible, TTEE	105512; 105522	Claimant has now responded to the Reorganized Debtors’ offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
George Coles (IRA)	103980; 104058; 104101; 104106	Claimant has now responded to the Reorganized Debtors’ offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Nantahala Capital Partners Limited Partnership	100113; 100314; 100317; 100461; 100475; 100640	Claimant has now responded to the Reorganized Debtors’ offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.

Claimant	Claim Nos.	Resolution
Meseroll, Alan	104878; 104882	Claimant has now responded to the Reorganized Debtors' offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Grant, Mary Pace	102732; 103152	Claimant has now responded to the Reorganized Debtors' offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
John A. Grant, Ttee Rene A. Desjardins Liv Trust	103363; 103442	Claimant has now responded to the Reorganized Debtors' offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
PACE Alternative Strategies Investments Fund - Long	107278	Claimant has now responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Ivy ProShares MSCI ACWI Index Fund	100298	Claimant has now responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Ivy VIP Corporate Bond	100368	Claimant has now responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Ivy Corporate Bond	100388	Claimant has now responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
California Public Employees' Retirement System ³	101607	Claimant has now responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.

³ On the afternoon of October 16, 2023, California Public Employees' Retirement System ("CalPERS") filed a precautionary opposition to the Objection to ensure that a Court order on the Objection would not expunge its claim. *See CalPERS Opposition to Debtors' Objection To Claim No. 101607* [Dkt. No. 14073]. CalPERS incorrectly stated in that precautionary opposition that "Debtors have acknowledged that the inclusion of Claim No. 101607 in the Objection was erroneous." *Id.* at 2.

Claimant	Claim Nos.	Resolution
Los Angeles City Employees' Retirement System	98965; 99020; 100603	Claimant has now responded to the Reorganized Debtors' offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Oil Investment Corporation Ltd	104189	Claimant has now responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
SMTB - IBM JAPAN PENSION	104234	Claimant has now responded to the Reorganized Debtors' offer to settle the claim that is subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
TCW US Credit Gold BM Fund	100700; 100859	Claimant has now responded to the Reorganized Debtors' offer to settle the claims that are subject to the Twenty-Sixth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.

PROPOSED ORDER TO BE SUBMITTED CONCURRENT WITH THIS REPORT

Pursuant to the Court's October 15, 2023 docket text order, the Reorganized Debtors will upload a proposed order sustaining the Objection and disallowing and expunging the proofs of claim listed in the column headed "Claim(s) to be Disallowed and Expunged" in **Exhibit A** to this report, which lists claims identical to those in **Exhibit 1** to the Twenty-Sixth Securities Claims Omnibus Objection, except as for the Responding Claims discussed above.

Dated October 16, 2023

**WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP**

By: /s/ Richard W. Slack
Richard W. Slack
Attorneys for Debtors and Reorganized Debtors

In fact, the Reorganized Debtors properly included Claim No. 101607 on the Objection because as of the date the Objection was filed – August 31, 2023 – CalPERS had not responded to their offer. CalPERS responded to the offer after the filing of the Objection. Because CalPERS responded to the offer after the filing of the Objection, the Reorganized Debtors have withdrawn that claim from the Objection.